

# Exhibit 45

**From:** [Chris Springer](#)  
**To:** [Swanson, Alexander](#); [Anne Davis](#); [Kutscher Clark, Martie](#); [Falconer, Russ](#); [Josh Samra](#); [Mumm, Laura C.](#); [Stein, Deborah L.](#); [Snyder, Orin](#); [Lipshutz, Joshua S.](#); [Herbert, Kelly E.](#)  
**Cc:** [Lesley Weaver](#); [Derek Loeser](#); [David Ko](#); [Cari Laufenberg](#); [Matt Melamed](#); [Benjamin Gould](#); [Adele A. Daniel](#); [Sarah R. Skaggs](#); [Cesar Tamondong](#); [Angelica Ornelas](#)  
**Subject:** RE: In re Facebook, Inc. Consumer Privacy User Profile Litigation - Plaintiffs' Fifth Set of Requests for Production  
**Date:** Thursday, November 4, 2021 2:26:13 PM

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[WARNING: External Email]

Hi Alex,

We are available to meet and confer from 3 to 5 pm on Monday, November 8.

Chris

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**From:** Swanson, Alexander <ASwanson@gibsondunn.com>  
**Sent:** Thursday, November 4, 2021 8:57 AM  
**To:** Anne Davis <adavis@bfalaw.com>; Kutscher Clark, Martie <MKutscherClark@gibsondunn.com>; Falconer, Russ <RFalconer@gibsondunn.com>; Josh Samra <jsamra@bfalaw.com>; Mumm, Laura C. <LMumm@gibsondunn.com>; Stein, Deborah L. <DStein@gibsondunn.com>; Snyder, Orin <OSnyder@gibsondunn.com>; Lipshutz, Joshua S. <JLipshutz@gibsondunn.com>; Herbert, Kelly E. <KHerbert@gibsondunn.com>  
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**Subject:** RE: In re Facebook, Inc. Consumer Privacy User Profile Litigation - Plaintiffs' Fifth Set of Requests for Production

Counsel,

We previously requested your availability to meet and confer regarding Plaintiffs' responses and objections to Facebook's interrogatories and RFPs and have not received a response. Our team members who focus on Facebook's discovery requests are available after 2 pm PT on Friday, as well as at after 12 pm PT on Monday (11/8) and between 9 am and 12 pm PT on Tuesday (11/9). Please let us know if any of these times work for you.

Thanks,  
Alex

**Alexander P. Swanson**

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**From:** Swanson, Alexander  
**Sent:** Thursday, October 28, 2021 9:10 AM  
**To:** 'Anne Davis' <[adavis@bfalaw.com](mailto:adavis@bfalaw.com)>; Kutscher Clark, Martie <[MKutscherClark@gibsondunn.com](mailto:MKutscherClark@gibsondunn.com)>; Falconer, Russ <[RFalconer@gibsondunn.com](mailto:RFalconer@gibsondunn.com)>; Josh Samra <[jsamra@bfalaw.com](mailto:jsamra@bfalaw.com)>; Mumm, Laura C. <[LMumm@gibsondunn.com](mailto:LMumm@gibsondunn.com)>; Stein, Deborah L. <[DStein@gibsondunn.com](mailto:DStein@gibsondunn.com)>; Snyder, Orin <[OSnyder@gibsondunn.com](mailto:OSnyder@gibsondunn.com)>; Lipshutz, Joshua S. <[JLipshutz@gibsondunn.com](mailto:JLipshutz@gibsondunn.com)>; Herbert, Kelly E. <[KHerbert@gibsondunn.com](mailto:KHerbert@gibsondunn.com)>  
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**Subject:** RE: In re Facebook, Inc. Consumer Privacy User Profile Litigation - Plaintiffs' Fifth Set of Requests for Production

Anne,  
Facebook is available to meet and confer regarding its R&Os on Wednesday, November 3, at 1 pm PT.

We would also like to meet and confer regarding Plaintiffs' R&Os to Facebook's last round of interrogatories and RFPs. We are available on November 1 after 12 pm PT and on November 2 after 11 am PT. Please let us know if either of those windows work for you.

Thanks,  
Alex

**Alexander P. Swanson**

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**From:** Anne Davis <[adavis@bfalaw.com](mailto:adavis@bfalaw.com)>

**Sent:** Wednesday, October 27, 2021 3:56 PM

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**Subject:** RE: In re Facebook, Inc. Consumer Privacy User Profile Litigation - Plaintiffs' Fifth Set of Requests for Production

[WARNING: External Email]

Martie-

Following up, Plaintiffs are available to meet and confer regarding Facebook's R&Os tomorrow 2:30-4:00 PT, next Tuesday between 12:00-2:00 PT, or next Wednesday after 10am PT. Please let us know if any of those times work for your team, or provide next week's availability for this topic.

Regards,

Anne Davis

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**From:** Anne Davis <[adavis@bfalaw.com](mailto:adavis@bfalaw.com)>

**Sent:** Thursday, October 21, 2021 3:13 PM

**To:** Kutscher Clark, Martie <[MKutscherClark@gibsondunn.com](mailto:MKutscherClark@gibsondunn.com)>; Falconer, Russ <[RFalconer@gibsondunn.com](mailto:RFalconer@gibsondunn.com)>; Josh Samra <[jsamra@bfalaw.com](mailto:jsamra@bfalaw.com)>; Mumm, Laura C. <[LMumm@gibsondunn.com](mailto:LMumm@gibsondunn.com)>; Stein, Deborah L. <[DStein@gibsondunn.com](mailto:DStein@gibsondunn.com)>; Snyder, Orin <[OSnyder@gibsondunn.com](mailto:OSnyder@gibsondunn.com)>; Lipshutz, Joshua S. <[JLipshutz@gibsondunn.com](mailto:JLipshutz@gibsondunn.com)>; Herbert, Kelly E.